



Indiana Economic Development Corporation

One North Capitol, Suite 700  
Indianapolis, Indiana 46204  
Tel 317.232.8800  
Fax 317.232.4146  
[www.AccelerateIndiana.com](http://www.AccelerateIndiana.com)

May 12, 2010

Barbara A. Nardi  
Office of General Counsel  
Family and Social Services Administration  
Indiana Government Center South  
402 West Washington Street  
Indianapolis, IN 46204

Dear Ms. Nardi:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 10-45 and proposed by the Indiana Family and Social Services Administration ("FSSA").

The proposed rule amends 405 IAC 5-3-13 to add partial hospitalization to services requiring prior authorization, to delete assertive community treatment intensive case management from the list of services requiring prior authorization, and to replace community mental health rehabilitation services with Medicaid rehabilitation option (MRO) services. The proposed rule amends 405 IAC 5-20-8 to exclude persons holding a master's degree in social work, marital and family therapy, or mental health counseling from being reimbursed for partial hospitalization services.

The rule defines the conditions under which partial hospitalization services will be reimbursed, the standards for partial hospitalization programs, and the exclusions to reimbursement for partial hospitalization services. The proposed rule removes partial hospitalization as a general service that is not reimbursable by Medicaid, except as provided under 405 IAC 5-21.5. Finally, the proposed rule also adds 405 IAC 5-21.5 to define MRO services and terms related to MRO services, and outlines reimbursement for MRO services.

The economic impact statement prepared by the FSSA indicates that none of the entities affected by the proposed rule satisfy the definition of small business. Consequently, FSSA has determined that the proposed rule will not impose any economic impact to small business.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 232-8962 or [rasberry@iedc.in.gov](mailto:rasberry@iedc.in.gov).

Regards,

A handwritten signature in black ink, appearing to read "Ryan Asberry", is written over a horizontal line.

Ryan Asberry  
Assistant Vice President